

**LAW OFFICES OF RAHUL WANCHOOR**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: 4/28/08  
DATE FILED: 4/28/08

**Law Offices of Rahul Wanchoo**  
357 Westfield Avenue, Suite 10  
Ridgewood, New Jersey 07450  
Telephone: (201) 882-0303  
Facsimile: (201) 301-3576

Empire State Building  
350 Fifth Avenue, 59<sup>th</sup> Floor  
New York, New York 10118  
Telephone: (646) 593-8866  
Facsimile: (212) 618-0213  
E-Mail: [rwanchoo@wanchoolaw.com](mailto:rwanchoo@wanchoolaw.com)  
Web site: [www.wanchoolaw.com](http://www.wanchoolaw.com)

April 25, 2008

**Via Facsimile - (212) 805-7924**

Honorable Sidney H. Stein  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 1010  
New York, NY 10007-1312

MEMO ENDORSED

**Re: Egyptian Navigation Co. v. Baker Investments Corp. et. al. 08 Civ. 02080 (SHS)**

Dear Hon. Judge Stein:

We represent the Plaintiff in the above captioned action and write in connection with your Honor's Opinion and Order ("Order") dated April 14, 2008, which granted Non-Party Adora Investments Inc.'s motion to vacate the attachment of \$127,755.79 restrained by Citibank. Plaintiff has filed an appeal of the Order to the Second Circuit. A copy of the Notice of Appeal is attached for your information.

Please note that the automatic 10-day stay of execution of the April 14, 2008 Order set forth in Federal Rule of Civil Procedure 62(a) will expire on April 28, 2008. Due to our conflicting work schedule, we respectfully request a one week extension to and including May 5, 2008 to file Plaintiff's motion pursuant to Federal Rule of Civil Procedure 62(c) for a stay pending appeal of the Order. We have spoken with counsel for Adora who indicated that he would recommend to his client that it consent to our request for an extension.

We thank you for your attention to this matter.

Respectfully submitted,

LAW OFFICES OF RAHUL WANCHOOR

*Rahul Wanchoo*  
Rahul Wanchoo (RW-8725)

SO ORDERED 4/25/08

Attachment.

cc: **Via e-mail:** [jwerner@lyons-flood.com](mailto:jwerner@lyons-flood.com)

*Sidney H. Stein*  
SIDNEY H. STEIN  
U.S.D.J.

**LAW OFFICES OF RAHUL WANCHOO**

Attorneys for Plaintiff  
350 Fifth Avenue, 59<sup>th</sup> Floor  
New York, New York 10118  
Phone: (646) 593-8866  
Fax: (212) 618-0213  
E-mail: rwanchoo@wanchoolaw.com

APR 25 2008

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

X

**EGYPTIAN NAVIGATION CO.**

**ECF CASE**

Plaintiff,

08 Civ. 02080 (SHS)

- against -

**BAKER INVESTMENTS CORPORATION and  
BAKER INTERNATIONAL GROUP.**

Defendants.

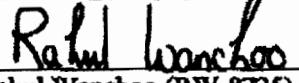
X

**NOTICE OF APPEAL**

NOTICE IS HEREBY GIVEN that Plaintiff EGYPTIAN NAVIGATION CO. ("ENC"), hereby appeals to the United States Court of Appeals for the Second Circuit from the Opinion and Order of the Honorable Sidney H. Stein dated April 14, 2008, which granted Non-Party Adora Investments Inc.'s motion to vacate the attachment of certain Electronic Funds Transfer (EFT) which were restrained pursuant to a Process of Maritime Attachment and Garnishment issued in favor of Plaintiff ENC. A copy of the aforementioned Opinion and Order is attached hereto.

Dated: April 24, 2008

**LAW OFFICES OF RAHUL WANCHOO**  
Attorneys for Plaintiff  
**EGYPTIAN NAVIGATION CO.**

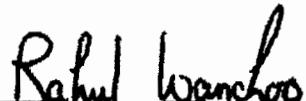
  
Rahul Wanchoo  
Rahul Wanchoo (RW-8725)

CERTIFICATE OF SERVICE

Rahul Wanchoo, an attorney duly admitted to practice before this Honorable Court, affirms on this 24<sup>th</sup> day of April, 2008, I served true copies of the foregoing, by U.S. Mail, first-class postage pre-paid, and by email to:

LYONS & FLOOD, LLP.  
Attorneys for Non-Party Adora Investments Inc.  
65 West 36<sup>th</sup> Street, 7<sup>th</sup> Floor  
New York, New York 10018

Attn: Kirk M. Lyons, Esq.



Rahul Wanchoo (RW-8725)